

VIA ECF

July 1, 2022

The Honorable Sarah Netburn
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Set Capital LLC, et al., v. Credit Suisse Group AG, et al.,*
No. 18-CV-02268 (AT) (SN)

Dear Magistrate Judge Netburn:

We represent the Defendants and Lead Plaintiffs, respectively, in the above-captioned litigation and write in response to Your Honor's Order dated April 1, 2022.

First, fact discovery is on track to be completed by November 17, 2022 and, at this time, the parties do not believe changes to the deadlines set forth in the Case Management Order are necessary. Defendants substantially completed their document productions by the June 21, 2022 deadline, are reviewing the remaining documents for production, and are meeting and conferring with Lead Plaintiffs about a limited number of additional requests.

Due to unforeseen circumstances, Lead Plaintiffs substantially completed their productions shortly after June 21, 2022.¹ Defendants have not had an opportunity to review those productions to confirm that Plaintiffs have, in fact, substantially completed production. If after reviewing the production Defendants believe modifications to the Case Management Order or any other relief is required, they will meet and confer with Lead Plaintiffs and advise the Court.

Second, the parties believe that a settlement conference is premature at this time. The parties will notify the Court if a settlement conference would be productive.

We appreciate the Court's attention to this matter and are available to answer any further questions the Court may have.

Respectfully submitted,

/s/ Sheila C. Ramesh
Sheila C. Ramesh

/s/ Laura H. Posner
Laura H. Posner

*Counsel for Defendants Credit Suisse Group AG,
Credit Suisse AG, Credit Suisse International,
Tidjane Thiam, and David R. Mathers*

*Counsel for Lead Plaintiffs Set Capital
LLC, Stefan Jager, Nikolay Drozhzhinov,
Aleksander Gamburg, and Apollo Asset
Limited*

¹ Nikolay Drozhzhinov did not substantially complete document production and, due to circumstances from the geopolitical situation in and around Russia and Ukraine, he will not be putting himself forward as a class representative.